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January 10, 2018

By ECF

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 1007

Re: *Carlos M. Salas et al. v. Peter Salas et al.*,
Case No. 16-cv-002248

Dear Magistrate Judge Freeman:

On behalf of defendants, Peter E. Salas, Dolphin Advisors, LLC, Dolphin Asset Management Corp., Dolphin Direct Equity Partners, LP and Dolphin Management, Inc., I write in response to Plaintiffs' letters to the Court dated December 20, 2017 and January 9, 2018.

To date, Defendants have produced more than 77,000 pages of documents, they have responded to Plaintiffs' written discovery requests, they have responded to Plaintiffs' supplemental discovery requests, and they appeared for depositions in early December. Plaintiffs asked for seven categories of documents at the deposition of Defendants' principal, but with the Christmas holidays, Defendants were not able to search for, collect, and produce the requested documents. Nevertheless, Defendants genuinely believed that the parties were working together to resolve any outstanding discovery disputes. Clearly, Plaintiffs believe otherwise.

Despite the different perspectives, Defendants will continue to search for relevant, non-privileged documents responsive to Plaintiffs' various requests (both formal and informal). Moreover,

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Defendants believe that a telephone conversation between the parties will resolve some of the outstanding discovery issues and narrow those for the Court to consider.¹ Defendants respectfully request that the Court direct the parties to discuss any outstanding discovery issues before ruling on Plaintiffs' letter motion.

Respectfully,

A handwritten signature in blue ink that reads "Daniel A. Osborn". The signature is written in a cursive, slightly slanted style.

Daniel A. Osborn

cc: Alex Litt, Esq. (by ECF and email)

¹ The parties may not be able to reach an agreement regarding the Dolphin Offshore documents; however, this is just one of several requests.